

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

CRISHNA A. PERSAUD

CASE NO.: 6:15-bk-10459

Debtor.

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**DEBTOR'S RESPONSE TO
TRUSTEE'S OBJECTION TO ATTORNEY FEES**

1. Debtor filed his Chapter 13 Bankruptcy Petition on December 16, 2015.
2. Debtor filed a Motion to Extend Automatic Stay on January 12, 2016 (DOC #10). Said motion was denied after hearing on the motion.
3. Debtor filed his Motion for Reconsideration on February 26, 2016 (DOC #23).
After a hearing on the matter, the motion was granted.
4. The claims bar date was April 13, 2016. As Debtor had no objection to the proof of claims that were filed, he did not object.
5. The Trustee filed her Objection to Attorney Fees on May 24, 2016, stating that the undersigned counsel's fees should be reduced because she failed to file an amended plan (DOC #47).
6. The undersigned counsel then contacted the Chapter 13 Trustee's office and was informed that she was expected to file an amended plan to incorporate the proofs of claim.
7. The undersigned counsel has since filed an Amended Chapter 13 Plan (DOC #70).

8. As the undersigned counsel has done extensive work and research for the above referenced Debtor and will continue to do so until his Chapter 13 plan is completed, the undersigned counsel respectfully objects to her fees being reduced.

WHEREFORE, Debtor moves this Court to deny Trustee's objection to attorney's fees.

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing has been sent by either electronic transmission or U.S. Mail this 18th of July 2016 to: **Laurie K. Weatherford, Chapter 13 Trustee**, P.O. Box 3450, Winter Park, FL 32790; and **Debtor: Crishna A. Persaud**, 117-06 107th Avenue, South Richmond Hill, NY 11419-2702.



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